

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

RAW STORY MEDIA, INC., ALTERNET
MEDIA, INC.,

Plaintiffs,

v.

OPENAI, INC., OPENAI GP, LLC,
OPENAI, LLC, OPENAI OPCO LLC,
OPENAI GLOBAL LLC, OAI
CORPORATION, LLC, and OPENAI
HOLDINGS, LLC,

Defendants.

No. 1:24-cv-01514-CM

PLAINTIFF’S NOTICE OF SUPPLEMENTAL AUTHORITY

Plaintiff writes to inform the Court of a recent decision against a different AI company, Meta Platforms, Inc., in which a district court denied Meta’s motion to dismiss a 17 U.S.C. § 1202(b)(1) claim against it. The Court held that the plaintiffs had standing, including because “the plaintiffs allege that the CMI removal facilitated and concealed actual infringement of their copyrights,” and that they plausibly alleged all their elements of their claim. Order at 1, *Kadrey v. Meta Platforms, Inc.*, No. 23-cv-03417 (N.D. Cal. Mar. 7, 2025), ECF No. 471. The decision is attached as Exhibit 1.

RESPECTFULLY SUBMITTED,

/s/ Stephen Stich Match

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Stephen Stich Match (No. 5567854)
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Thomas Kayes*
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**pro hac vice*

March 11, 2025